

DOCKET FILE COPY ORIGINAL

ANN RAVENDER
HARRY F. COLE
ANN F. GOODWIN GRUMP
VINCENT J. CURTIS JR.
PAUL F. FIDMAN
FRANK R. JAZZO
EUGENE M. LAWSON JR.
MITCHELL LAZARUS
SUSAN A. MARSHALL
HARRY C. MARTIN
J. LE G. PETHO
RAYMOND J. QUIANZON
JAMES P. RILEY
ALISON J. SHAPIRO
KATHLEEN VICTORY
JENNIFER DINE WAGNER
LILIANA E. WARD
HOWARD M. WEISS

NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON VIRGINIA 22209-3801

OFFICE (703) 812-0400

FAX (703) 812-0486

www.fhhlaw.com

RETIRED MEMBERS
RICHARD HILDRETH
GEORGE PETRUTSAS

CONSULTANT FOR INTERNATIONAL AND
INTERGOVERNMENTAL AFFAIRS
SHELDON J. KRYS
U.S. AMBASSADOR (ret.)

OF COUNSEL
EDWARD A. CAINE
DONALD J. EVANS
FRANCISCO R. MONTERO
EDWARD S. O'NEILL
ROBERT M. GURSS

WRITER'S DIRECT
(703) 812-0471

December 19, 2003

RECEIVED

DEC 19 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
The Portals II
445 12th Street, S.W.
Washington, D.C. 20554

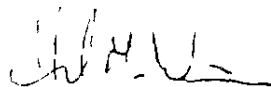
Re MB Docket No. 03-77
RM-10660

Dear Madame

Enclosed for filing are an original and four copies of a Joint Motion For Leave to File Joint Additional Supplemental Comments and Joint Additional Supplemental Comments

Should there be any questions, please contact the undersigned counsel

Sincerely,



Howard M. Weiss

HMW/et
Enclosure
cc All Parties on Certificate of Service

No. of Copies rec'd. 0+4
List ABOVE

ORIGINAL
RECEIVED

Before the
Federal Communications Commission
Washington, DC 20554

DEC 19 2003

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
(Ashland, Coaling, Cordova, Decatur,)
Dora, Hackleburg, Hobson City,)
Holly Pond, Midfield, Sylacauga,)
and Tuscaloosa, Alabama, and Atlanta,)
Georgia))

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. 03-77

RM-10660

To: Assistant Chief, Audio Division
Media Bureau

**JOINT MOTION FOR LEAVE TO FILE JOINT
ADDITIONAL SUPPLEMENTAL COMMENTS**

Cox Radio, Inc., and its wholly owned subsidiary CXR Holdings, Inc (collectively "Cox"), Williams Communications ("Williams"),¹ and Kea Radio, Inc., and Pulaski Broadcasting, Inc. (collectively "Counterproponents") (all collectively the "Joint Movants") hereby move for leave to submit additional supplemental comments in the above-captioned proceeding. The purpose of the submission is to urge the Commission, subject to the required public notice of the Counterproposal and any comments triggered thereby, to approve both the Cox proposal and the Counterproposal, as modified, to eliminate their mutual exclusivity. The recommended resolution, supported by all parties to the proceeding, would serve the public interest by promptly facilitating substantial new service (including first local transmission service) to


¹ Williams is the licensee of Stations WASZ, Ashland, Alabama, and WTRB-FM, Sylacauga, Alabama. Williams consented to the modifications of WTRB-FM's community of license from Sylacauga to Ashland, Alabama and WASZ's license from Ashland to Hobson City, Alabama, in an Amendment to the Petition For Rule Making filed on November 27, 2002.

listeners in the various affected communities. It would also conserve scarce Commission resources by terminating burdensome litigation necessary to determine which of the proposals should be adopted.

Accordingly, the Joint Movants respectfully request that the Commission consider on their merits the attached Joint Additional Supplemental Comments, and, subject to the necessary public notice, grant the relief requested therein.

Respectfully submitted,

COX RADIO, INC.
CXR HOLDINGS, INC.

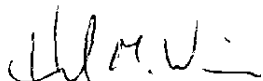
By.  _____

Kevin F. Reed
Christina H. Burrow
Nam E. Kim

Their Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N.W.
Suite 800
Washington, DC 20036
(202) 776-2000

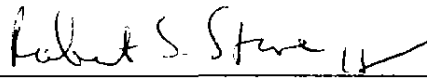
WILLIAMS COMMUNICATIONS

By: 
Howard M. Weiss

Its Attorney

Fletcher, Heald & Hildreth PLC
1300 N. 17th Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

**KEA RADIO, INC.
PULASKI BROADCASTING, INC.**

By: 
Robert S. Stone

Their Attorney

McC Campbell & Young, PC
2021 First Tennessee Plaza
P.O. Box 550
Knoxville, TN 37901-0550
(865) 637-1440

CERTIFICATE OF SERVICE

I, Evelyn Thompson, a secretary at Fletcher, Heald & Hildreth PLC, hereby certify that a true and correct copy of the foregoing "Joint Motion for Leave to File Joint Additional Supplemental Comments" was sent on this 19th day of December, 2003, via First-Class United States mail, postage pre-paid, to the following:

*Mr John A Karousos
Federal Communications Commission
Media Bureau
Audio Division
445 12th Street, S W
Room 3-A266
Washington, DC 20554

Ms Penelope Nielsen
President
NCA, Inc.
287 Telephone Tower Road
Lacey's Springs, AL 35754

Mr. Houston Pearce
New Century Radio, Inc
142 Skyland Boulevard
Tuscaloosa, AL 35405

Mr. Clark Jones
Voice of Cullman, L L C
Eddins Broadcasting Co , Inc
18 Col Winstead Drive
Brentwood, TN 37037

*R Barthen Gorman, Esquire
Federal Communications Commission
Media Bureau
Audio Division
445 12th Street, S W
Room 3-A224
Washington, DC 20554

*Robert Hayne, Esquire
Federal Communications Commission
Media Bureau
Audio Division
445 12th Street, S.W.
Room 3-A224
Washington, DC 20554

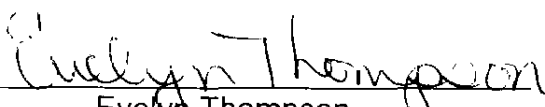
Larry D Perry, Esquire
11464 Saga Lane
Knoxville, TN 37931
(Counsel for NCA, Inc.)

Erwin G. Krasnow, Esquire
Shook, Hardy & Bacon LLP
600 14th Street, N W
Suite 800
Washington, DC 20005
(Counsel for New Century Radio, Inc.)

M Scott Johnson, Esquire
Gardner Carton & Douglas
1301 K Street, NW, East Tower
Suite 900
Washington, DC 20005-3317
(Counsel for Voice of Cullman, L L C
and Eddins Broadcasting, Co., Inc.)

Chris Williams
Queen of Peace Radio, Inc.
391 14th Avenue South
Jacksonville Beach, FL 32250

*Denotes hand delivery.


Evelyn Thompson

ORIGINAL

**Before the
Federal Communications Commission
Washington, DC 20554**

RECEIVED

In the Matter of)
)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations)
(Ashland, Coaling, Cordova, Decatur,)
Dora, Hackleburg, Hobson City,)
Holly Pond, Midfield, Sylacauga,)
and Tuscaloosa, Alabama, and Atlanta,)
Georgia))

DEC 19 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

MM Docket No. 03-77

RM-10660

To: Assistant Chief, Audio Division
Media Bureau

JOINT ADDITIONAL SUPPLEMENTAL COMMENTS

Cox Radio, Inc., and its wholly owned subsidiary CXR Holdings, Inc (collectively "Cox"), Williams Communications ("Williams"), and Kea Radio, Inc., and Pulaski Broadcasting, Inc. (collectively "Counterproponents") (all collectively the "Joint Movants") hereby respectfully submit their Joint Additional Supplemental Comments. These comments urge the Commission to adopt a settlement among the various parties in the above-captioned proceeding. Pursuant thereto, both the initial proposal submitted by Cox and the counterproposal submitted by Counterproponents would be grantable. This would manifestly serve the public interest by bringing new FM service (including first transmission service) to many listeners and conserving scarce Commission resources by the avoidance of further litigation. In support hereof, the Joint Movants submit as follows:

1 On March 21, 2003, the staff released a Notice of Proposed Rulemaking regarding Cox's proposal to, inter alia, downgrade Station WBHJ(FM), Tuscaloosa, Alabama, to C2 status and move it to Midfield, Alabama, as that community's first local aural service. To accommodate the foregoing, Cox proposed (a) to reallocate Station WFMH-FM from Holly Pond, Alabama to Hackleburg, Alabama, as Hackleburg's first local service; (b) to replace the local service at Holly Pond by reallocating Station WRSA(FM) from Decatur, Alabama, to Holly Pond, (c) to reallocate Station WFFN(FM) from Cordova to Coaling, Alabama as Coaling's first local service and (d) to replace the local station at Cordova by reallocating Station WQOP-FM from Dora to Cordova.

2. Further, pursuant to an amendment to the Cox petition for rulemaking, the staff proposed to move Station WASZ(FM) from Ashland, Alabama to Hobson City, Alabama as its first local FM and first nighttime service. To replace the service at Ashland, the NPRM proposed to reallocate Station WTRB-FM from Sylacauga, Alabama to Ashland. This in turn requires the reclassification of Station WSB-FM, Atlanta, Georgia, to Channel 253CO

3 On May 12, 2003, Counterproponents submitted comments and a counterproposal. They advocated the reallocation of Channel 252A from Pulaski, Tennessee to Killen, Alabama as 252C3 and the upgrade of Channel 252A at Scottsboro, Alabama to 252C3. This Counterproposal is mutually exclusive with Cox's proposed reallocation of Channel 238A at Hobson City.

4 Subsequent pleadings filed by the parties have debated Counterproponents' city-grade coverage of Scottsboro. The pleadings also raised concerns about Counterproponents' claim to first local service at Killen. The Commission has not yet issued a notice seeking comment on the Counterproposal.

5. In an effort to bring this expensive and time consuming litigation to an end, and to expedite substantial new service to the several communities at issue here, the parties have conducted discussions regarding settlement. Based on analysis prepared by Cox's consulting engineer, Charles Cooper, with slight modification of the Scottsboro coordinates, both proposals can be implemented consistent with Commission rules. Moreover, the parties believe that the alleged deficiencies in the Scottsboro counterproposal are remediable by adjustment of transmitter site reference coordinates and supplementation of the showing submitted by Counterproponents regarding Killen.

6 Mr Cooper's Technical Exhibit alters the Scottsboro, Alabama Channel 252C3 reference site to ensure that there will be no issue regarding city-grade coverage. No change in the Pulaski, Tennessee coordinates is proposed. Mr. Cooper utilizes the amended reference coordinates for the Ashland, Alabama channel 252A allotment previously proposed by Cox in its August 25, 2003 Response to Supplemental Comments. (See Technical Exhibit at Exhibit A) Those are 33°13'30"N and 85°53'40"W. Mr. Cooper opines that utilization of this alternate reference site and the Scottsboro coordinates be proffers permits adoption of both the Cox proposal and the Counterproposal.

7. The only further issue raised in the pleadings was whether the Counterproponents had made a sufficient showing under Faye and Richard Tuck, 3 FCC Rcd 5374 (1988), that reallocation to Killen constitutes a preferential arrangement of allotments. Counterproponents did demonstrate that, while Killen is located within the Florence - Sheffield - Muscle Shoals - Tuscumbia Urbanized Area, it is separated from the major population centers of the Urbanized Area by Shoals Creek, a large tributary of Wilson Lake which flows into the Tennessee River. (See Supplemental

Comments, filed July 21, 2003.) This geographical separation is accentuated by the fact that Muscle Shoals, Tusumbia and Sheffield are in a different county -- Culbert -- than Florence and Killen, which are in Lauderdale County. Moreover, Killen generally identifies itself with Rogersville, Alabama as a separate community whose interests align, in a region known as East Lauderdale County. Indeed, statements submitted by Killen community leaders (see Attachments to Supplemental Comments) opine that "Killen is independent from the Florence, Alabama Urbanized Area, and that [the declarant] and other residents of Killen perceive Killen as separate and distinct from the Florence Urbanized Area." All "urge the FCC to allow WКСR-FM to change its community of license to Killen so that we may have our own local radio station."

8 Attached hereto is an exhibit prepared by Cox's consultant, Gregory Perdue, which reflects the results of a visit to Killen, as well as supplemental computer research. Mr. Perdue has verified that Killen is an incorporated city with a population of 1,118 person (Florence has 36,264 persons, Muscle Shoals 11,924, Sheffield 9,652 persons and Tuscumbia 7,856 persons). Killen is governed by its own Mayor and Board of Aldermen and provides municipal services to its residents, including its own full-time police force, a court, parks and recreation and a volunteer fire department. A City Clerk and City Attorney assist the Mayor and Board. It also has its own public library, community organizations, numerous churches, pre-schools, elementary and secondary schools and numerous businesses based in the community. The town has *its own separate zip code and post office*. The Killen Clinic provides health care with staff physicians.

9 Mr. Perdue has also discovered that The East Lauderdale News, published weekly in Rogersville, focuses on East Lauderdale County issues and serves

advertisers in that region Charter Cable provides cable to Killen, Elgin and Rogersville, Alabama, while Comcast is the cable operator in Florence. While the Killen system has no local reserved public access channel, the operator does preempt other programming for stories about Killen and neighboring communities. Finally, while formalized workforce data is unavailable, Mr. Perdue's research indicates that there are over 1,800 jobs in Killen, and that a substantial number of its residents work either in the city or in the industrial plants remote from Florence referenced in Counterproponents' showing. Mr. Perdue also observes that Killen has no fewer than twelve banks, and is a trading area/commercial crossroads at the intersection of major highways, U.S. 72 and U.S. 43.

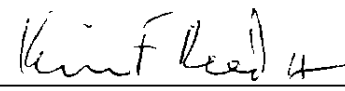
10 The foregoing, when combined with data submitted by Counterproponents, satisfies the Tuck test under recent precedent. As in Amendment of Section 202(b), Table of Allotments, FM Broadcast Stations (Chillicothe and Ashville, Ohio), DA 03-3443, October 31, 2003, the data indicates that at least a sizeable percentage of Killen's residents work at its many business, governmental offices, and schools. Killen has a local weekly paper upon which it relies, albeit not within its city limits, but not in Florence either.

11 With respect to the third Tuck factor, Killen community leaders have provided the statements submitted by Counterproponents. Killen has its own government and elected officials, as well as other municipal services, such as police and fire protection, fulfilling the fourth Tuck factor. Its own zip code satisfies the fifth factor. The substantial number of local businesses meets the sixth Tuck test. While we have no definitive evidence as to the advertising markets in the area, Killen and the rest of East Lauderdale County appear to constitute a separate trade area from Florence. Some municipal services, as noted above, are provided by Killen institutions.

12 On balance, as in the Ashville case, the great majority of the Tuck standards are met by Killen's separate, independent status. The Commission should move promptly to release notice of the Counterproposal in anticipation of an expedited grant of the requested allotments, should there be no adverse comments received.

Respectfully submitted,

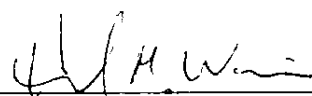
COX RADIO, INC.
CXR HOLDINGS, INC.

By: 
Kevin F. Reed
Christina H. Burrow
Nam E. Kim

Their Attorneys

Dow, Lohnes & Albertson, PLLC
1200 New Hampshire Avenue, N W
Suite 800
Washington, DC 20036
(202) 776-2000

WILLIAMS COMMUNICATIONS

By: 
Howard M. Weiss

Its Attorney

Fletcher, Heald & Hildreth PLC
1300 N 17th Street, 11th Floor
Arlington, Virginia 22209
(703) 812-0400

**KEA RADIO, INC.
PULASKI BROADCASTING, INC.**

By. Robert S. Stone
Robert S. Stone

Their Attorney

McCampbell & Young, PC
2021 First Tennessee Plaza
P.O. Box 550
Knoxville, TN 37901-0550
(865) 637-1440

TECHNICAL EXHIBIT

TECHNICAL EXHIBIT
AMENDMENT TO COUNTERPROPOSAL
FILED IN MB DOCKET 03-77

Technical Narrative

This technical narrative and associated exhibits have been prepared in support of an amendment to the counterproposal filed in MB Docket 03-77. The counterproposal requests the upgrade of channel 252A to 252C3 at Scottsboro, Alabama and the re-allotment of channel 252A at Pulaski, Tennessee to Channel 252C3 at Killen, Alabama. Acceptance of this amendment should permit both this counterproposal and the initial Petition for Rule Making to be granted.

This amendment only slightly changes the Scottsboro, Alabama Channel 252C3 allocation reference site, to ensure that there will be no issue regarding city grade coverage. No change is proposed for the Pulaski component

Proposed Channel 252C3 Killen, Alabama (No Change)

It is proposed to delete Channel 252A at Pulaski, Tennessee and allot Channel 252C3 to Killen, Alabama. There are currently no existing aural services in Killen. The proposed Killen allotment will be the first full-time aural service assigned to Killen. Pulaski would have one aural service remaining, full-time station WKSJ(AM) on 1420 kilohertz.

The existing 70 dBu contour of Channel 252A at Pulaski does not encompass any U.S. Census defined urbanized area. The proposed 70 dBu contour of Channel 252C3 at Killen encompasses 31.7 square kilometers, or 61%, of the Florence, Alabama urbanized area and 43,000 persons, or 60%, of the Florence, Alabama urbanized area population

The attached Sheet 1 of Figure 2 is a tabulation of the required separations pertinent to the use of Channel 252C3 at Killen. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all existing, authorized and proposed stations and allotments, except for two petitions for rule makings, one on channel 252C1 at Ardmore, Alabama and the other on channel 253A at Linden, Tennessee. However, these proposals have been dismissed by the Commission in MM Docket 01-62, and therefore, are no longer allocation issues. Operation from the reference site identified below will provide the requisite city grade signal to all of Killen. Sheet 2 of Figure 2 is a coverage map showing the 70 dBu contour and the city limits of Killen.

Below are the Channel 252C3 Killen reference site geographic coordinates:

34° 58' 40" North Latitude

87° 36' 05" West Longitude

The town of Killen has a population of 1,119 persons. The Florence urbanized area encompasses 40% of the Killen area and 72% of the Killen population.

The Channel 252C3 service gain area would contain 152,140 persons over an area of 4,271 square kilometers. The loss area would contain 43,100 persons over 1,957 square kilometers. The total proposed Channel 252C3 60 dBu service area would contain 165,680 persons over 4,776 square kilometers as compared to the existing Channel 252A 60 dBu service area containing 56,640 persons over 2,462 square kilometers.

The other aural services that would serve the Channel 252A loss area are provided in Sheet 4 of Figure 2. A cumulative portion of the loss area of 4.5 square kilometers containing 50 persons would have four remaining aural services. No persons in the loss area will receive less than four aural services.¹

¹ A small portion of the Channel 252A loss area (less than 1 square kilometer) would have only 3 aural services remaining. However, no population centroids are located within this area.

Proposed Channel 252C3 Scottsboro, Alabama (Amended)

It is proposed to slightly amend the proposed Channel 252C3 Scottsboro reference point so it can provide 70 dBu service to the entire community of Scottsboro.²

Neither the existing Channel 252A nor the proposed Channel 252C3 70 dBu contours at Scottsboro encompass any U S. Census defined urbanized area.

The attached Sheet 1 of Figure 3 is a tabulation of the required separations pertinent to the use of Channel 252C3 at Scottsboro. The proposed reference site complies with the Commission's minimum distance separation requirements contained in Section 73.207 to all pertinent existing, authorized and proposed stations and allotments except to a *Petition for Rule Making* for Channel 252C1 at Ardmore, Alabama and the existing Channel 252A at Pulaski, Tennessee.³ The Ardmore proposal has been dismissed by the Commission in MM Docket 01-62, and therefore, is no longer an allocation issue. It is proposed in the herein counterproposal (see aforementioned section) to reallocate Channel 252A from Pulaski to Channel 253C3 at Killen, Alabama. Therefore, Channel 252A at Pulaski would not be an allocation issue upon the reallocation to Killen.

Operation from the reference site identified below will provide the requisite city grade signal to all of Scottsboro. Sheet 2 of Figure 3 is a coverage map showing the 70 dBu contour and the city limits of Scottsboro.

² To calculate the 70 dBu coverage contour, uniform terrain is employed as per Commission allocation policy.

³ The Channel 252A Ashland, Alabama reference coordinates as amended by Cox (33-13-30/85-53-40) are employed and therefore, the proposed Channel 252C3 at Scottsboro is fully-spaced to the proposed Channel 252A at Ashland.

Below are the amended Channel 252C3 Scottsboro
alternate reference site geographic coordinates:

34° 30' 40" North Latitude

86° 01' 54" West Longitude

The Channel 252C3 service gain area would
contain 97,520 persons over an area of 2,314 square
kilometers. There is no loss area. The total proposed
Channel 252C3 60 dBu service area would contain 164,700
persons over 4,775 square kilometers as compared to the
existing Channel 252A 60 dBu service area containing
67,180 persons over 2,461 square kilometers.

Proposed Modifications to Table of Allotments

This proposal provides for the following
allotment changes to Section 73.202, The Commission's
Table of FM Allotments.

<u>City, State</u>	<u>Present</u>	<u>Proposed</u>
Pulaski, TN	252A	---
Killen, AL	---	252C3
Scottsboro, AL	252A	252C3

Charles A. Cooper

du Treil, Lundin & Rackley, Inc.
201 Fletcher Avenue
Sarasota, Florida 34237
941.329.6000

November 20, 2003

TECHNICAL EXHIBIT
PETITION FOR RULE MAKING

Summary of 60_dBu Service Gain/Loss Analysis

Allotment	Loss Area (km ²)	Gain Area (km ²)	Loss Population	Gain Population
Pulaski, TN	1,957	---	43,100	---
Killen, AL	---	4,271	---	152,140
Scottsboro, AL	---	2,314	---	97,520
Total	1,957	6,585	43,100	249,660

The proposal would have a "net" gain of 206,560 persons and a "net" gain of 4,628 square kilometers.

Note: Population based upon 2000 Census.

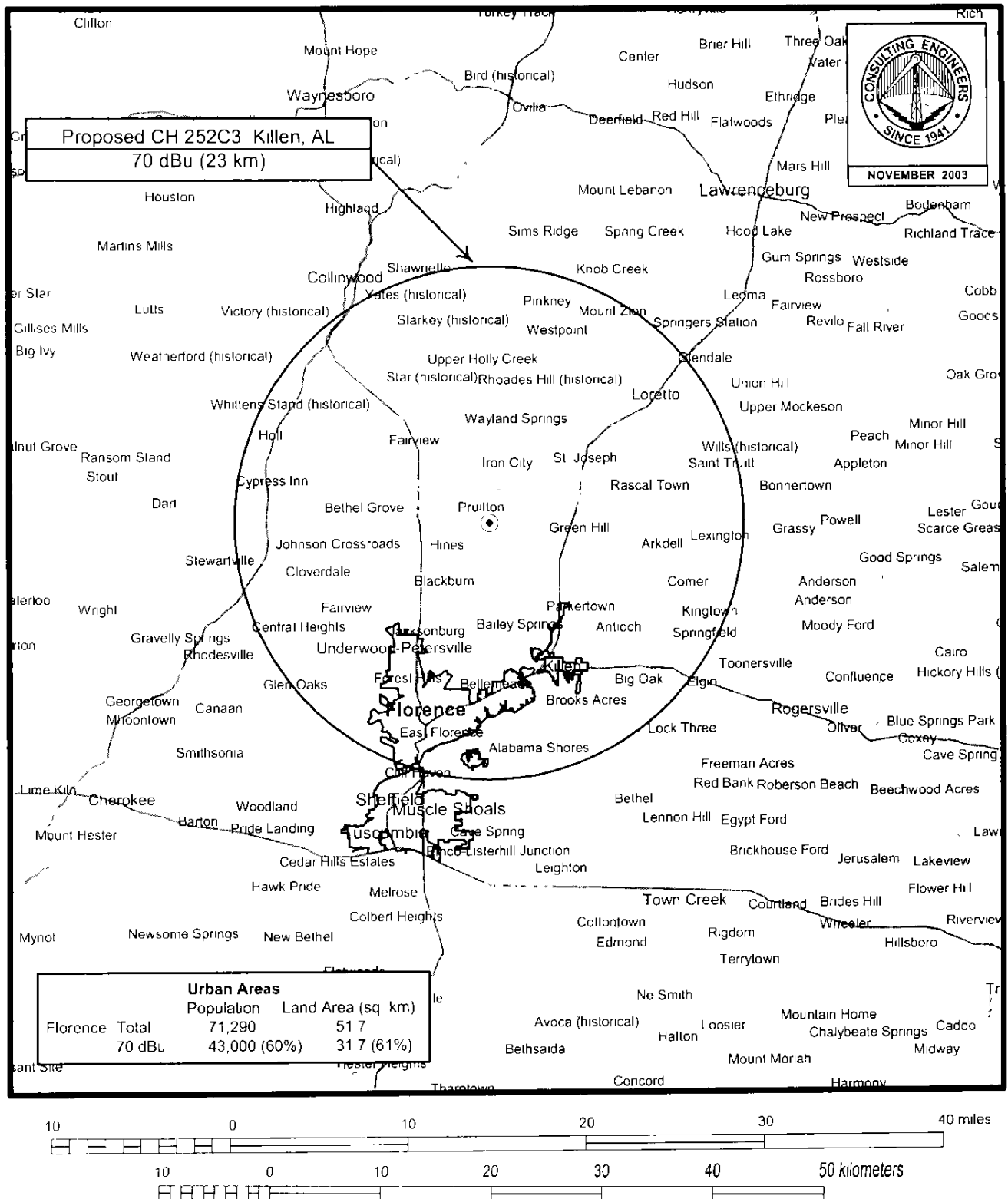
TECHNICAL EXHIBIT
PETITION FOR RULE MAKING

Channel 252C3 Killen, Alabama Allocation Study (No Change)

34° 58' 40" North Latitude
87° 36' 05" West Longitude

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
	KILLEN	RM	252C3		34-58-40	96 9	0 00	153 0
	AL ADD C	bg-67	98 3		087-36-05			
WKSR-F	PULASKI	BLH	252A	6	35-08-47	67 9	50 17	142 0
53875	TN LIC C	19941220KC	98 3	97	087-05-28			
[Subject station of amendment No allocation concern]								
	PULASKI	RM	252A		35-08-47	67 9	50 17	142 0
	TN DEL C	10053	98 3		087-05-28			
	ARDMORE	RM	252C1		34-56-27	93 0	72 93	211 0
	AL ADD C	10053	98 3		086-48-15			
[Proposal to add Channel 252C1 to Ardmore was dismissed in MB Docket 01-62]								
WKEA-F	SCOTTSBORO	BLH	252A	2 35	34-35-22	105 9	153 48	142 0
33781	AL LIC C	19840416BZ	98 3	162	085-59-31			
	SCOTTSBORO	RM	252A		34-35-22	105 9	153 48	142 0
	AL DEL C	10053	98 3		085-59-31			
	SCOTTSBORO	RM	252C3		34-29-53	109 9	153 96	153 0
	AL ADD C	bg-67	98 3		086-01-26			
WKEA-F	SCOTTSBORO	BPH	252A	1 55	34-41-35	101 0	158 78	142 0
33781	AL CP C	20010123ABH	98 3	200	085-54-01			
WPIK-F	METROPOLIS	BMPH	252C1	100	36-45-09	338 0	212 96	211 0
63817	IL CP C	19941019IB	98 3	213	088-29-58			
	LINDEN	RM	253A		35-37-02	343 2	74 17	89 0
	TN ADD C	10113	98 5		087-50-22			
[Proposal to add Channel 253A to Linden was dismissed in MB Docket 01-62]								
WZLQ	TUPELO	BLH	253C1	100	34-10-05	238 1	168 61	144 0
58828	MS LIC C	19960308KC	98 5	299	089-09-23			

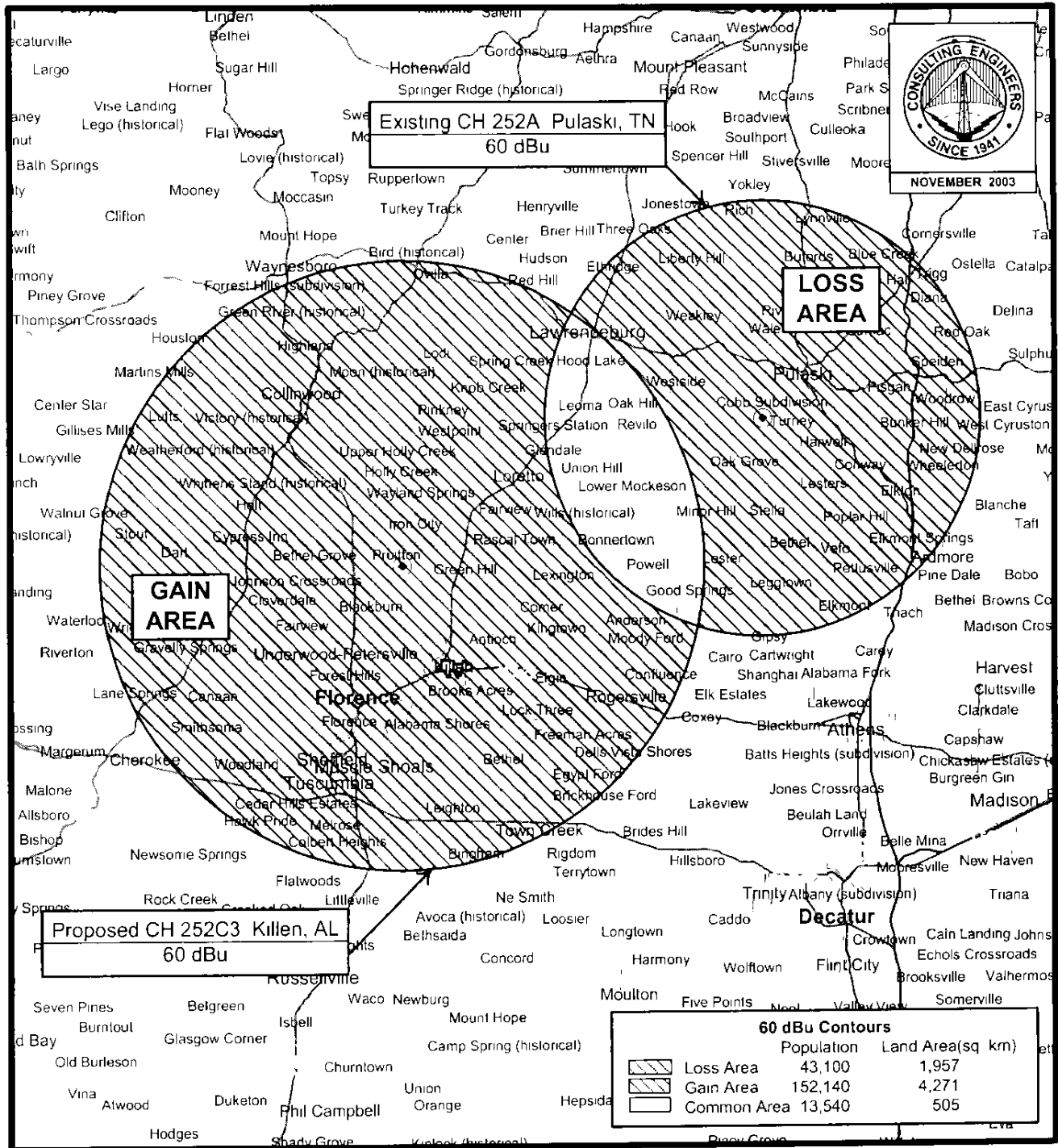
Figure 2
Sheet 2 of 4



PROPOSED KILLEN 70 dBu COVERAGE CONTOUR

PETITION FOR RULE MAKING

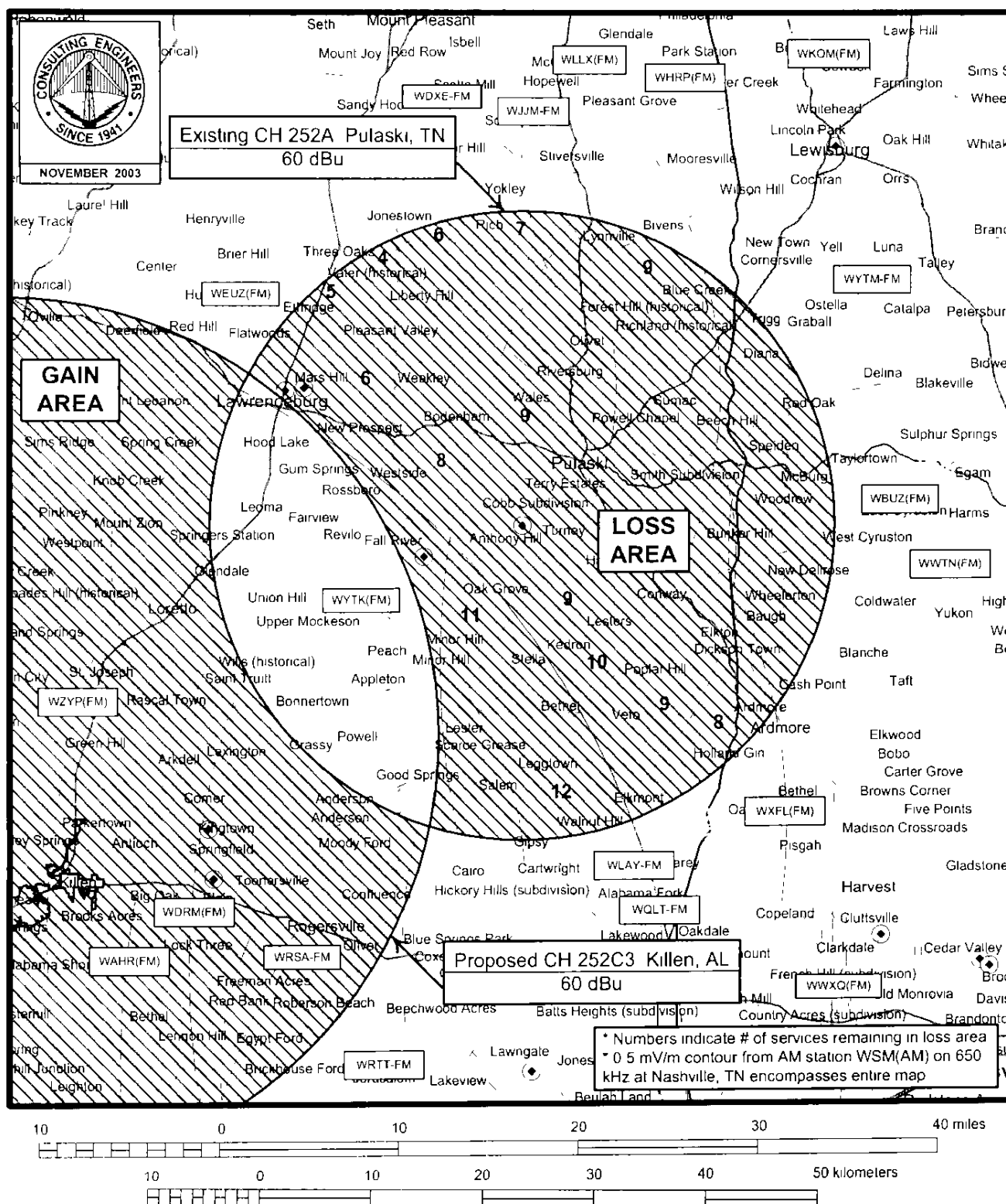
du Treil, Lundin & Rackley, Inc., Sarasota, Florida



KILLEN GAIN/LOSS AREA

PETITION FOR RULE MAKING

du Treil, Lundin & Rackley, Inc., Sarasota, Florida



KILLEN LOSS AREA OTHER SERVICES

PETITION FOR RULE MAKING


du Treil, Lundin & Rackley, Inc, Sarasota, Florida

TECHNICAL EXHIBIT
PETITION FOR RULE MAKING

Channel 252C3 Scottsboro, Alabama Allocation Study (Amended)

34° 30' 40" North Latitude
86° 01' 54" West Longitude

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist. (km)	Req. (km)
WKXJ 72371	SIGNAL MOUN BLH TN LIC C 19940816KF		251A 98 1	1 242	35-05-16 085-21-47	43 4	88 52	89.0
	SCOTTSBORO RM AL DEL C bg-67		252A 98 3		34-29-53 086-01-26	153 8	1.62	142 0
	SCOTTSBORO RM AL ADD C bg-67		252C3 98 3		34-29-53 086-01-26	153 8	1 62	153 0
WKEA-F 33781	SCOTTSBORO BLH AL LIC C 19840416BZ		252A 98 3	2 35 162	34-35-22 085-59-31	22 7	9 42	142 0
[Subject station of amendment. No allocation concern]								
WKEA-F 33781	SCOTTSBORO BPH AL CP C 20010123ABH		252A 98 3	1 55 200	34-41-35 085-54-01	30 7	23.51	142.0
	ARDMORE RM AL ADD C 10053		252C1 98 3		34-56-27 086-48-15	304 3	85 32	211 0
[Proposal to add Ardmore, AL Rule Making dismissed by Commission]								
WKSJ-F 53875	PULASKI BLH TN LIC C 19941220KC		252A 98 3	6 97	35-08-47 087-05-28	306 4	119 83	142 0
[Herein proposed to delete Channel 252A at Pulaski and allocate Channel 252C3 to Killen. Therefore, no allocation issue]								
	PULASKI RM TN DEL C 10053		252A 98 3		35-08-47 087-05-28	306 4	119 83	142 0
	KILLEN RM AL ADD C bg-67		252C3 98 3		34-58-40 087-36-05	290 3	152 78	153 0
	ASHLAND RM AL ADD C 10660		252A 98 3		33-13-30 085-53-40	174 9	143 22	142 0
[Amended Channel 252A at Ashland reference coordinates employed]								
WTRB-F 704	SYLACAUGA BLH AL LIC C 20020523AAM		252A 98 3	2 25 166	33-04-23 086-10-06	184 6	160 00	142 0
WSB-FM 73978	ATLANTA BLH GA LIC C 19980903KB		253C 98 5	100 313	33-45-33 084-20-05	117.7	177 36	176 0



NOVEMBER 2003

